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April 28, 2011

VIA EMAIL

Scott S. Balber, Esq. Chadbourne & Parke, LLP 30 Rockefeller Plaza New York, NY 10112

Re: Fortress Value Recovery Fund I, LLC v. Columbus Components Group, LLC, et al. U.S. District Court for the Northern District of Ohio, Case No. 1:11-CV-00200

Dear Mr. Balber:

In the course of Tuesday's email exchange between you and Pete Elliott, counsel for Hawthorn Manufacturing Corporation and Patrick James, you claim that you reviewed "Mr. Keating's discovery requests". As you presumably know, however, neither I nor any of my colleagues have served you with any discovery requests on behalf of Columbus Components Group, LLC, CCG Holdings, LLC, or PJ Management Group, LLC. Instead, I was waiting to receive your letter in which you promised to demonstrate that the standing defense raised by all of the Defendants was a "red herring" before serving any discovery requests.

Indeed, you may recall that I sent you an email on April 19, inquiring when I might receive such a letter. You never replied.

Thus, I was disappointed to learn Tuesday afternoon that you have now changed your position, and you will not be sending such a letter, nor explaining how the standing defense is a "red herring" until you respond to outstanding discovery. Obviously, if that is your position, we will send you some discovery requests within the next few days.

Such discovery requests are, however, without waiver of our right to insist that you do provide the letter as you promised to us and to Judge Gwin at the case management conference. You



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have already stated that there is no further need to discuss this matter and that your change in position is final. We will therefore seek the assistance of the Court to hold you to your word.

Very truly yours

Patrick J. Keating

PJK/lcs

cc;

Pete Elliott, Esq. Philip R. Wiese, ESq. CCG Holdings, LLC

PJ Management Group, LLC

Columbus Components Group, LLC

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